

## **Reference 81**

# Texas Department of Water Resources

## INTEROFFICE MEMORANDUM

TO : Gary Schroeder, Chief, Solid Waste and Spill Response, Enforcement and Field Operations Division      DATE: March 28, 1984

THRU :

FROM : Carlton Stanley, District 12

SUBJECT: Midgulf Energy (formerly Uni Refining, Inc.)  
Solid Waste Registration No. 31288

On February 7, 1984 Russell Lewis and I conducted an annual solid waste compliance inspection at Midgulf Energy. This facility was recently purchased by Midgulf Energy. Uni Refining, Inc. is currently in bankruptcy proceedings. The refinery has been operating intermittently since February 1981, according to Rich Thompson, Vice President of Refining.

The last District 12 inspection on February 9, 1982 revealed some violations due in part to the company's overall solid waste management strategy. The company originally submitted a Part A application as a storage and processing facility; the company failed to meet applicable interim status requirements. Since the 2-9-82 inspection the company submitted an affidavit of exclusion claiming a small quantity generator exclusion. Subsequent to the submission of the affidavit, Permits Division wrote the company (letter dated 2-10-84) stating that they felt the company did not qualify for the exclusion after a review of the company's Part A. District 12 contacted Permits Division and advised them that the refinery does not process or dispose of any hazardous waste on-site. According to Permits Division, they were going to revise the 2-10-84 letter. District 12 does not have the revised letter in our files.

Waste generation at the refinery hasn't changed since the last inspection; the volume of waste generated is minimal. The company still generates spent caustic, API separator sludge, biological sludge and crude oil tank bottoms. The company had the spent caustic tested for hazardous corrosive characteristics and the sample results indicated the material was nonhazardous. A copy of the lab report is attached.

It appears that the company corrected most of the deficiencies noted during the 2-9-82 inspection by going for the small quantity exclusion and doing a hazardous waste determination of the spent caustic.

Two noncompliances were noted during the inspection. They are as follows:

- 1) The notice of registration was not current; violation of TAC 335.6(b)(c). The following changes to the registration should be made:
  - a) company name should be changed to Midgulf Energy, Inc.;

- b) change person in charge to Rich Thompson;
  - c) change disposition of waste 01 to off-site;
  - d) change disposition of waste 02 to off-site/sold for recovery;
  - e) change the disposition of waste 03 to on-site; and
  - f) add API separator sludge disposed of off-site.
- 2) The company had not sent in the required monthly and annual solid waste disposal activity forms; violation of TAC 335.9(3).

The refinery representative reported the company hoped to get back to production capacity in the near future.

It appears that, for the company to maintain the small quantity generator status, the volume of API separator sludge generated will need to be monitored frequently so that no more than 1,000 kilograms is disposed of in a one-month period.

CHS/cb

Attachments

Signed

Carlton Stanley

Approved

Paul Kitchin

TEXAS DEPARTMENT OF WATER RESOURCES  
Industrial Solid Waste Disposal Compliance Monitoring Inspection

Inspection Cover Sheet (see reverse side for checklist use and general instructions)

Compliant \_\_\_\_\_

Texas Permit/Reg. No. 31288

Noncompliant ✓

EPA I.D. No. TXD08627850

Site Operator Information:

Name of Company MIDGULF ENERGY (FORMERLY UNI REFINING INC.)

Company's Address 2100 WEST LOOP SO. SUITE 1100  
HOUSTON, TX 77027

Phone No. 712-627-7272

Site Address FM 2725 E BISHOP RD. (P.O. Box 970, ENGLISIDE, TX 78362)

Phone No. 512/776-2537 County SAN PATRICK

Type of Industry oil refining

Indicate below Classes of Waste managed (Hazardous-H, Class I nonhazardous-NH, Class II-

Generator NH, H, II Transporter \_\_\_\_\_ Small Quantity Generator ✓

Treatment \_\_\_\_\_ Disposal \_\_\_\_\_ Storage \_\_\_\_\_; 90 Day Exemption \_\_\_\_\_

Site Information (T.S.D. facilities only)

1. Are facilities located outside the 100 year flood plain area? NO

2. Describe land use within one mile RESIDENTIAL, INDUSTRIAL

3. Closed or abandoned facilities NO

Inspection Information:

1. Inspector's Name & Title CARLTON STANLEY, Field Rep. Russell Lewis, Geologist

2. Inspection Date 2-7-84

3. Inspection Participants Rich Thompson, VICE PRESIDENT REFINING

Approved: Paul K. Kistner  
District Supervisor

Signed: Carlton Stanley  
Inspector

Date: 3-28-84

# INDUSTRIAL SOLID WASTE

## Non-Major Compliance Monitoring Inspection Report Generators and Facilities Checklist

### Section A - Manifest

1. TDWR manifest is properly completed.

Yes ☒ No ☐ N/A ☐

Note: If generator is a small quantity generator, manifesting is the only pretransport requirement.

LAST OFFSITE SHIPMENT late 1982

### Section B - Hazardous Waste Determination

1. On a copy of the registration, note generated solid waste(s) listed in Part 261 Subpart D with "L" (listed) and solid waste(s) that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity) with "C" (characteristic).
2. If notification or disposition of waste stream changes is not current, explain in comments sheet.

SEE  
I.O.M.

### Section C - Recordkeeping and Reports

1. Generator maintains the required records and reports for 3 years.

Yes ☒ No ☐

### Section D - General Facility Standards

1. Proof of deed recordation of on-site disposal facilities has been provided to the agency.
2. All spills have been reported.

Yes ☐ No ☐ N/A ☒  
Yes ☐ No ☐ N/A ☒

NOTE: Attach a sketch of facilities. For all nonhazardous facilities do not complete the remainder of this Checklist. Use specific type facility checklists (from Group II form) and complete one checklist for each disposal facility.

STOP HERE IF FACILITY IS A SMALL QUANTITY GENERATOR.

### Section E - Pretransport Requirements

(According to \_\_\_\_\_ Name, Owner/Operator)

1. Generator appears to have standard procedures for packaging, labeling and marking of hazardous waste.
2. Accumulation Time - (May accumulate hazardous waste for up to 90 days without a permit).
- a. Each container used to temporarily store waste before transport is clearly dated.

Yes ☐ No ☐ N/A ☐

Yes ☐ NO ☐ N/A ☐

TDWR-

Page 1 of 3

Revised 3/10/83 - FFY 1983

81 004

JORDAN LABORATORIES, INC.  
CHEMISTS AND ENGINEERS  
CORPUS CHRISTI, TEXAS  
MARCH 24, 1982

UNI REFINING, INC.  
P.O. BOX 970  
INGLESIDE, TEXAS 78362

REPORT OF ANALYSIS

IDENTIFICATION: SPENT CAUSTIC

PH ----- 11.8

CORROSION RATE (NACE STANDARD TM Q1-69), MILS/YR ----- 0.7

LAB. NO. M20-2080

RECEIVED

MAR 31 1982

DEPT. OF  
WATER RESOURCES  
DISTRICT 12

RESPECTFULLY SUBMITTED,

CARL F. CROWNOVER

81 005



## HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT

INDUSTRY NAME: Mid Gulf Energy Inc, (Formerly Uni Oil Inc) PHONE: (512) 776-2537SITE ADDRESS: P.O. Box 970, Ingleside, Texas ZIP: 78362 COUNTY: SAN PATRICIOTDWR PERMIT OR REGIS. NO. 31208 EPA ID NO. TXD086278039INDUSTRY NAME UNI DISTRICT 12 DATE REPORT SUBMITTED MO/FYTYPE OF FACILITY GFT MAJOR/NONMAJOR N TYPE OF EVALUATION EVDATE OF EVALUATION OR ENFORCEMENT REFERRAL 02-07-84

Types Of Violations	Deg.	Date Of Notif. Letter	Date Of Inf. Enf. Act.	Date Response Due	Date Of Actual Compliance	Resolved/ Unresolved
GWM						
INC						
CLO						
FIN						
PTB						
MAN						
SCH						
OTH	3	03-29-84		04-30-84		

## COMMENTS:

• 01 6(6) 5 U 93 3 U

1 3 5 9 11 13 15 19 21 23 25 29 31 33 35 39 41 43

45 49 51 53 55 59 61 63 65 69 71 73 75 79 81 83 85 89 91 93

NUMBER OF SAMPLES:



MIDGULF ENERGY, INC.  
Post Office Drawer 970  
Ingleside, Texas 78362

31228

April 6, 1984

GIVEN TO  
INSPECTOR BY  
HAND

5/85

Mr. Paul Kutchinski, P. E.  
Texas Department of Water Resources  
District 12  
505 South Water Street  
Corpus Christi, Texas 78401

Re: Solid Waste Registration  
No. 31288

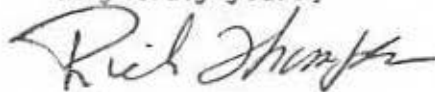
Dear Mr. Kutchinski:

Please change the company name on the above mentioned registration number to Midgulf Energy, Inc. formerly known as Uni Refining, Inc.

Mr. Rich Thompson is Vice President of Refining and is in charge of the facilities located at Bishop Road and Fm 2725, Ingleside, Texas.

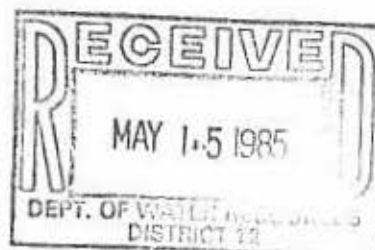
Please change your records accordingly.

Very truly yours,



Rich Thompson

RT/rg



0 to R 5-15-85

81 007